

UNITED STATES DISTRICT  
COURT  
FOR THE EASTERN DISTRICT OF  
WISCONSIN MILWAUKEE DIVISION

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THE ESTATE OF THE UNBORN CHILD  
OF JENNIFER JAWSON; and JENNIFER  
JAWSON,

Plaintiffs,

Case No.: 19-CV-1008

v.

MILWAUKEE COUNTY, et al.,

Defendants.

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**CIVIL L.R. 7 NON-DISPOSITIVE MOTION TO WITHDRAW AS COUNSEL**

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Alon Stein (“Local Counsel”) moves the Court, pursuant to Civil L.R. 7, to withdraw as local counsel for Armor Correctional Health Services Inc. (“Armor”). In so moving, Local Counsel states as follows:

1. Local Counsel filed his Appearance in this matter on behalf of Defendant, Armor with this Court on August 19, 2023. Since that time, there has only been one docket entry, (#274, NOTICE by Melissa C McLaughlin *Suggestion of Assignment for Benefit of Creditors*).

2. Defendant Armor has directed Counsel to withdraw his Appearance in this cause based on the Assignment for the Benefit of Creditors and the inability to pay Local Counsel.

3. An attorney may withdraw from a case if “good cause” for withdrawal exists. *Fidelity Nat. Title Ins. Co. of New York v. Intercounty Nat. Ins. Co.*, 310 F.3d 537, 540 (7th Cir. 2002), citing *Model Rules of Professional Conduct*, Rule 1.16(b)(7). Inability to pay legal

fees and expenses with the prospect of incurring is “good cause”. *Fidelity Nat. Title Ins. Co. of New York*, 310 F.3d at 540. Civil litigants generally have no right to free legal aid in civil lawsuits. *Maus v. Greening*, 2013 U.S. Dist. LEXIS 74587, 2013 WL 2318148 (E.D. Wis. May 28, 2013).

3. A copy of this Motion to Withdraw Appearance will be sent to the at the following address: by certified mail: Armor Correctional Health Services, Inc., 4960 SW 72<sup>nd</sup> Avenue, Suite 400, Miami, Florida 33155, and to Kelly Huerta at [kelly.huerta@armorhealthcare.com](mailto:kelly.huerta@armorhealthcare.com), the contact person for Armor’s legal matters.

WHEREFORE, Alon Stein requests that the Court grant this Motion to Withdraw as Local Counsel of record for Armor Correctional Health Services Inc.

Dated this 29<sup>th</sup> day of November, 2023.

/s/ Alon Stein  
Alon Stein  
(State Bar # 1034854)  
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